REMARKS

Claims 1-37 are currently pending in the subject application and are presently under consideration. A version of all pending claims is found at pages 5-10. The specification has been amended herein to cure minor informalities. Applicants' representative notes with appreciation the Examiner's indication that claims 3-11, 15, 18-21, 27 and 31-37 would be allowable if rewritten in independent form to include all of the limitations of the base claim and any intervening claims. Applicants' representative respectfully reserves the right to do so at a later date. However, such amendments are not presently believed to be necessary in view of the comments herein. Favorable consideration of the subject patent application is respectfully requested in view of the comments herein.

I. Rejection of Claims 1, 12-14, 16, 22-26 and 28-29 Under 35 U.S.C. §102(b)

Claims 1, 12-14, 16, 22-26 and 28-29 stand rejected under 35 U.S.C. §102(b) as being anticipated by Aronson *et al.* (US 6,128,673). It is respectfully requested that this rejection should be withdrawn for at least the following reason. Aronson *et al.* fails to teach or suggest each and every limitation set forth in the subject claims.

> A single prior art reference anticipates a patent claim only if it *expressly or inherently describes each and every limitation set forth in the patent claim. Trintec Industries, Inc. v. Top-U.S.A. Corp.*, 295 F.3d 1292, 63 USPQ2d 1597 (Fed. Cir. 2002); *See Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the ... claim. *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989) (emphasis added).

The invention as claimed relates to a system and method that facilitates use of various removable Small Form Factor (SFF) devices at a common connector, wherein the Small Form Factor devices employ different bus protocols from that of the bus associated with the connector. As recited in independent claims 1, 16, 28 and 29, the claimed invention ***routes data between a bus and an associated connector*** via a selection system,

and further provides that the ***selection system operates in a first mode to convert between a protocol supplied at the connector and a protocol of the bus ... and a second mode to pass the protocol between the bus and the connector without protocol conversion*** .... Aronson *et al.* fails to teach or suggest these exemplary features.

Aronson *et al.* relates to a protocol translator that translates communications between two I/O ports. In particular, Aronson *et al.* teaches *a single chip* digital protocol translator that translates communications from a first digital protocol at a first I/O port to a second digital protocol at a second I/O port. (*See*, col. 10, lines 44-63). It is apparent that the single chip device described by Aronson *et al.* is interpositioned between two I/O ports, rather than between a connector and a computer bus, and further that the translation facility between the two I/O ports resides solely on the single chip device; all communication and translation between the two I/O ports takes place within the chip itself. Aronson *et al.* therefore is silent on routing data between a bus and an associated connector through a selection system.

Aronson *et al.* further is silent regarding ***a selection system capable of operating in two modes depending upon whether the device attached to the connector is communicating in the same protocol as the bus, or in a protocol different from that of the bus***. Applicants' invention as recited in the subject claims on the other hand, is capable of determining whether or not the device attached to the connector is capable of communicating in the same protocol as the bus. Where the device attached to the connector communicates in a protocol different from that of the bus, the selection system determines the protocol being sent and selects an appropriate interface to establish communications with the device through the connector. Where the device attached to the connector communicates in the same protocol as the bus, the selection system implements a pass-through interface, and a communications path with the device attached to the connector is established without the necessity of protocol conversion. This is in contrast to Aronson *et al.* where two disparate communications protocols are selected, *e.g.* USB and Ethernet, and a chip created with the ability to translate between the two pre-selected protocols. The ensuing chip created in Aronson *et al.* is therefore confined to providing translation from a first pre-selected protocol to the second pre-selected protocol. Aronson *et al.* clearly does not envision circumstances where conversion from

a first protocol to a second protocol would be unnecessary, in which case a pass-through mode would be all that is necessary. The facility to select an appropriate mode depending upon the device attached to the connector therefore allows the claimed invention to handle the various devices that may be attached to the connector. It is this facility that further distinguishes the claimed invention from Aronson *et al.*

In view of at least the foregoing it is respectfully requested that this rejection be withdrawn with respect to independent claims 1, 16, 28 and 29 (and claims that depend therefrom).

II. Rejection of Claims 2, 17 and 30 Under 35 U.S.C. §103(a)

Claims 2, 17 and 30 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Aronson *et al.* (US 6,128,673) in view of Arato *et al.* (US 6,535,522 B1). It is respectfully requested that this rejection be withdrawn for at least the following reasons. Claims 2, 17 and 30 depend from independent claims 1, 16 and 29 respectively, and Arato *et al.* does not cure deficiencies presented by Aronson *et al.* as discussed above. Accordingly, withdrawal of this rejection and allowance of claims 2, 17 and 30 is respectfully requested.

CONCLUSION

The present application is believed to be in condition for allowance in view of the above comments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

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